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6	UNITED STATES DISTRICT COURT		
7	DISTRICT OF NEVADA		
8	UNITED STATES OF AMERICA,	Case No. 2:25-mj-00308-DJA	
9	Plaintiff,	Stipulation to Extend Deadlines to Conduct Preliminary Hearing and	
10	v.	File Indictment (Second Request)	
11	RHASHAN HUNTER,		
12			
13	Defendant.		
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15	IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah,		
16	United States Attorney, and Justin Washburne, Assistant United States Attorney, counsel		
17	for the United States of America, and Joy Chen, Assistant Federal Public Defender, counsel		
18	for Defendant RHASHAN HUNTER that the Court schedule the preliminary hearing in		
19	this case for no earlier than 30 days from the date of the filing of this stipulation. The		
20	preliminary hearing is currently set for May 15, 2025 at 4:00pm. This request requires that		
21	the Court extend two deadlines: (1) that a preliminary hearing be conducted within 14 days		
22	of a detained defendant's initial appearance, see Fed. R. Crim. P. 5.1(c); and (2) that an		
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information or indictment be filed within 30 days of a defendant's arrest, see 18 U.S.C.

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§ 3161(b).

This stipulation is entered into for the following reasons:

- The government has provided discovery to defense counsel which counsel is 1. currently reviewing, and the parties intend to engage in good faith plea negotiations to resolve this matter before an indictment or information is filed.
- 2. Under Federal Rule of Criminal Procedure 5.1(c), the Court "must hold the preliminary hearing within a reasonable time, but no later than 14 days after the initial appearance if the defendant is in custody "
- 3. However, under Rule 5.1(d), "[w]ith the defendant's consent and upon a showing of good cause—taking into account the public interest in the prompt disposition of criminal cases—a magistrate judge may extend the time limits in Rule 5.1(c) one or more times "
- 4. Furthermore, under the Speedy Trial Act, 18 U.S.C. § 3161(b), "[a]ny information or indictment charging an individual with the commission of an offense shall be filed within thirty days from the date on which such individual was arrested or served with a summons in connection with such charges."
- 5. Defendant needs additional time to review the discovery and investigate potential defenses to make an informed decision as to how to proceed, including whether to accept a plea agreement.
- Defendant is in custody and agrees to the extension of the 14-day deadline imposed by Rule 5.1(c) and waives any right to remedies under Rule 5.1(c) or 18 U.S.C. § 3161(b), provided that the information or indictment is filed on or before the date ordered pursuant to this stipulation.

1	7.	The parties agree to the ex	tension of that deadline.
2	8.	This extension supports th	e public interest in the prompt disposition of
3	criminal cases by permitting defendant to negotiate a plea prior to an indictment or		
4	information being filed.		
5	9.	Accordingly, the additional time requested by this stipulation is allowed	
6	under Federal Rule of Criminal Procedure 5.1(d).		
7	10. In addition, the parties stipulate and agree that the time between today and		
8	the scheduled preliminary hearing is excludable in computing the time within which the		
9	defendant must be indicted and the trial herein must commence pursuant to the Speedy		
10	Trial Act, 18 U.S.C. § 3161(b) and (h)(7)(A), considering the factors under 18 U.S.C.		
11	§ 3161(h)(7)(B)(i) and (iv).		
12	11.	This is the second request	for an extension of the deadlines by which to
13	conduct the preliminary hearing and to file an indictment.		
14	DATED this 9th day of May, 2025.		
15			Respectfully submitted,
16		LLADARES blic Defender	SIGAL CHATTAH United States Attorney
17	/s/ Joy Che		/s/Justin Washburne
18		ederal Public Defender	JUSTIN J. WASHBURNE
19		I HUNTER	Assistant United States Attorneys
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 2:25-mj-00308-DJA

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v.

RHASHAN HUNTER,

Defendant.

[Proposed] Order on Stipulation to Extend Deadlines to Conduct Preliminary Hearing and File Indictment

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served; the time requested by this stipulation being excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and (h)(7)(A), and Federal Rule of Criminal Procedure 5.1, considering the factors under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv):

IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled on May 15, 2025 at the hour of 4:00 p.m., be vacated and continued to **June 16, 2025, at 4:00 p.m.**

DATED this 9th day of May, 2025

HONORABLE DANIEL J. ALBREGTS UNITED STATES MAGISTRATE JUDGE

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